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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JOSE JUAN RIVERA ALATORRE,)	Case No.: 1:23-cv-01686-SKO
)	
Plaintiff,)	STIPULATION AND UNOPPOSED
)	MOTION FOR AN EXTENSION OF TIME;
vs.)	ORDER
)	
)	
MARTIN O'MALLEY,)	
Commissioner of Social Security,)	
)	
Defendant.)	

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended fourteen (14) days from July 3, 2024, up to and including July 17, 2024. This is the Defendant's second request for an extension.

The undersigned counsel for Defendant ("Counsel") makes this request in good faith and for good cause. Upon review of the record and Opening Brief, Counsel prepared a memorandum to the client exploring settlement options in this matter. To allow time for the client to respond to the memorandum and negotiate a possible settlement with Plaintiff, or draft a responsive brief, if necessary, I am requesting a 14-day extension, until July 17, 2024, to file Defendant's brief.

1 Although Counsel has worked diligently on this matter and other assigned cases, this extension is
2 necessary.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5
6 Respectfully submitted,

7 Dated: July 2, 2024

/s/ Dolly M. Trompeter*

8 DOLLY M. TROMPETER

9 Attorney for Plaintiff

(*signature authorized via e-mail July 2, 2024)

10
11 Dated: July 2, 2024

PHILLIP A. TALBERT

12 United States Attorney

MATHEW W. PILE

13 Associate General Counsel

14 Office of Program Litigation, Office 7

15 By: /s/ Michael J. Mullen

16 MICHAEL J. MULLEN

17 Special Assistant U.S. Attorney

18 Attorneys for Defendant

19 **ORDER**

20 Pursuant to the parties' Stipulation (Doc. 19), and for good cause shown,

21 IT IS HEREBY ORDERED that Defendant shall have an extension of 14 days, to July 17,
22 2024, to file the Commissioner's responsive brief. Plaintiff shall have up to and including July 31,
23 2024, to file an optional reply.

24
25 IT IS SO ORDERED.

26 Dated: **July 3, 2024**

/s/ Sheila K. Oberto

27 UNITED STATES MAGISTRATE JUDGE